

1 THE HONORABLE BENJAMIN H. SETTLE
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 TODD BRINKMEYER

11 Petitioner,

12 v.

13 WASHINGTON STATE LIQUOR AND
14 CANNABIS BOARD,

15 Respondent.

16 Case No. 3:20-cv-05661-BHS

17 **SECOND DECLARATION OF TODD
18 BRINKMEYER IN SUPPORT OF MOTION
19 FOR PRELIMINARY INJUNCTION**

20 I, Todd Brinkmeyer, hereby declare and state as follows:

21 1. I am the petitioner in this action, over the age of eighteen, have personal knowledge
22 of the matters contained in the Declaration, and am competent to testify thereto.

23 2. I was attracted to Washington State's cannabis industry because of how it operated
24 under a legal system, and how the state committed to stop treating adult-use licensed marijuana
25 like a criminal enterprise. It was important to me that the industry be legal before I participate in
26 it, and the industry is legal under Washington State law. I would not have become a financier for
Washington marijuana businesses or sought to obtain an equity interest in the Stores had I known
the respondent would treat that licensed business conduct as criminal. I have no interest in
supporting or engaging in criminal activity. That includes my commitment to comply with the
laws of my home state, which I have done and will continue to do.

3. My spouse resides with me in Idaho.

Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

EXECUTED in Post Falls, ID on this 28th day of August, 2020

DocuSigned by:

DC6349CEBD44F1...
Todd Brinkmeyer

**SECOND DECLARATION OF TODD BRINKMEYER IN
SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION - 2**

DECLARATION OF SERVICE

I, Brie Geffre, hereby declare under penalty of perjury under the laws of the United States and of the state of Washington, that on this 28th day of August, 2020, I caused the foregoing to be filed using the CM/ECF system which will send notice of the same to all registered parties

SIGNED at Seattle, Washington this 28th day of August, 2020.

s/Brie Geffre
Brie Geffre, Legal Assistant

DECLARATION OF SERVICE - 3
USDC No. 3:20-cv-05661-BHS

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